

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

**UNITED STATES OF AMERICA** §

v. § **Case Number: 2:22-cr-00185**

**TERRENCE JAMES BRUGGEMAN** §

**DEFENDANT AND GOVERNMENT'S JOINT MOTION TO CONTINUE  
FINAL PRETRIAL CONFERENCE AND TRIAL**

Defendant TERRANCE JAMES BRUGGEMAN (“Defendant” or “Mr. Bruggeman”) and the United States of America (“Government”) jointly file this motion to continue the pretrial conference and trial. In support of this motion, the parties show the following:

1. On January 16, 2025, the Court granted Defendants motion to dismiss Count One of the Second Superseding Indictment (the Forced Reset Trigger alleged machine gun count). Thereafter, on February 11, 2025 the Court granted a joint motion for continuance of the above referenced case setting the case for trial on June 2, 2025 with a final pretrial conference on May 22, 2025.

2. On February 13, 2025 the Government filed a notice of appeal as to the earlier dismissal order of Count 1 of the indictment. On March 26, 2025 the Fifth Circuit granted the Government's motion to suspend the schedule for briefing as to the appeal. No briefing has been undertaken to date.

3. The remaining three (3) counts of the Second Superseding Indictment (Doc. 33) charge Mr. Bruggeman with the knowing possession of a “firearms” (referred to as “silencers” – one being mis-marked and, therefore, not properly registered (Count 2); one alleged “firearm silencer” consisting of parts that constitute a “firearm silencer” and required to be registered (Count Three); and one “firearm silencer” consisting of a “black metal cylindrical device” that was “not

identified by serial number" (Count 4). The Parties anticipate that the case will involve novel questions of fact and law regarding the mechanics of the subject devices and potential challenges by the defense as to whether certain of the alleged silencers are, in fact, silencers. As a result, the case has required forensic analysis and testimony by experts called by the Government and/or Mr. Bruggeman.

4. The Defendant and Government believe that judicial economy and the interest of justice would be served by waiting until the Fifth Circuit rules on the pending appeal of the dismissal of Count One.

5. Considering the evolving law on the issues in this proceeding, including the appeal of the *NAGR* case before the Fifth Circuit, the Government and Defendant have been and still are seeking to have the matter resolved without the necessity of a trial.

6. Mr. Bruggeman is living on bond and is complying with the terms thereof.

7. Given the foregoing and the complexity of the case and the reasons noted above, Defendant and the Government request a continuance of the present trial setting days and, additionally, request that alternative dates be provided for trial after conference with the Court's representative such that coordination with Defendant's and the Government's out-of-state expert witnesses may be arranged.

8. Counsel for Mr. Bruggeman has conferred with Mr. Bruggeman concerning this request for continuance and certify that he agrees with the request.

**Certificate of Conference**

9. I certify that I have conferred with AUSA's Lance Watt, counsel for the Government, concerning the foregoing motion, and he advised that the Government joins in the motion.

For the foregoing reasons, the Defendant and the Government respectfully request that the Court continue the final pretrial conference and trial.

Respectfully submitted,

By: /s/ Paul G. Kratzig

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### **CERTIFICATE OF SERVICE**

I certify that on April 15, 2025, a copy of the foregoing document was served upon the following counsel of record, by either: (1) the Court's Electronic Filing System, pursuant to Local rule 5.1, if they have consented to electronic service, or (2) by email if they have not so consented.

/s/ Paul G. Kratzig  
Paul G. Kratzig

By email to:

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